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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

MAY 18 2015

OFFICE OF  
AIR, WASTE AND  
TOXICS

Ms. Georgia Baxter, Chief Executive Officer  
J.H. Baxter and Co.  
PO Box 5902  
San Mateo, California 94402

Re: Comments on Remedial Action Pilot Study Operations and Monitoring Report, Fourth Quarter 2014, April Monthly Progress Report, and Response to Request for a Reduction in Reporting Former J.H. Baxter & Co. (Baxter), Arlington Facility (Facility)  
§ 7003 Administrative Order on Consent (Order)  
Docket No.: RCRA-10-2001-0086  
EPA ID No.: WAD 05382 3019

Dear Ms. Baxter:

The U.S. Environmental Protection Agency, Region 10 has received Baxter's *Remedial Action Pilot Study Operations and Monitoring Report, Fourth Quarter 2014* (Report), dated March 2015, the *April Monthly Progress Report*, dated April 8, 2015, and your request, dated April 8, 2015, for a reduction in reporting required under the above referenced Consent Order. The EPA's comments on the Report, the Progress Report, and response to your request are below.

Comments on Remedial Action Pilot Study Operations and Monitoring Report, Fourth Quarter 2014

Overall the new format for the Quarterly Reports is acceptable, with the following exceptions:

- At the beginning of the Quarterly Reports there must be a summary of "significant developments this Reporting Period" which highlights significant changes from previous quarters and includes an analysis of the reasons for the change and planned actions.
- The figures which have comparisons of water elevations to the baseline elevation contours from January 2008 are no longer necessary. If Baxter would like to continue making these comparisons (such as Figures 3 & 5) the text should include a section which discusses why these comparisons are useful.
- Figure 4. It is unclear from the figure whether or not the wells were pumping at the time the water level measurements were taken for contouring. That information should be included in the legend and text of the Report.
- Figure 6. The figure needs a note and text of the Report needs to discuss the large changes in gradients after January 1, 2013 and July 1, 2013.

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- Figure 7. No change to the Report but there needs to be a new round of sampling which includes all the wells. Monitoring wells MW-1, MW-11, MW-21, MW-13, MW-19, MW-20, MW-12, and others have not been sampled for some time.
- Figure 21. The cross-hatching used in this cross section should use different symbols for the PCP and for other materials (Wood or LNAPL). Just color does not make the dissolved plume sufficiently distinctive.

Comments on April 2015 Progress Report

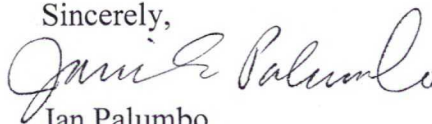
The format of the April 2015 Progress Report is acceptable.

Response to Request for a Reduction in Reporting

As we discussed at our meeting on March 23, 2015, it is acceptable to the EPA to reduce the number of reports to two semi-annual reports and one Stand Alone Data Document. The monthly progress reports would provide the monitoring data and a summary of any issues or changes. The change to the reporting schedule is effective upon receipt of this letter. The first semiannual report and all subsequent semiannual reports must address the above comments.

Please contact me at (206) 553-6702 or at [palumbo.jan@epa.gov](mailto:palumbo.jan@epa.gov), or have your legal counsel contact Jennifer MacDonald at (206) 553-8311 or [macdonald.jennifer@epa.gov](mailto:macdonald.jennifer@epa.gov), if you have any questions.

Sincerely,



Jan Palumbo  
Project Coordinator

cc: Mr James C. Hanken  
Wolfstone, Panchot & Bloch

Ms. Rue Ann Thomas  
Nattura Group

Mr. Edward C. Smith  
McFarland Cascade Holdings Inc.  
Stella-Jones Corp.

Mr. Dean Yasuda  
Washington State Department of Ecology

Ms. Heidi Blischke  
GSI Water Solutions, Inc.



## Region 10 Routing and Concurrence

Author:	Jan Palumbo	Date:	5/18/15
Addressee:	Georgia Baxter		
Subject:	Comments on Fourth Quarter 2014 O and M Report and Reply to Request for Reduced Reporting		
File Location/Name:			

### PROGRAM ADMIN REVIEW:

Name:	MCLEOD	PALUMBO <i>JP</i>	MACDONALD	FUENTES	POLICY FILE YES/NO	RCRAINFO YES/NO
Initials/Date:		<i>5/18/15</i>				

### PROGRAM OFFICE CONCURRENCE:

Name:	BLANKENSHIP	KNITTEL	CASTRILLI <i>X</i>	VALDEZ <i>X</i>	HEDEEN		
Initials/Date:			<i>5/18/15</i>				

### RA OFFICE CONCURRENCE/SIGNATURE:

Name:						
Initials/Date:						

**cc(s)** (include name, title, organization, mailing address, and email if PDF is required—attach a list if necessary)

James C Hanken Wolfstone, Panchot & Bloch 1111 Third Ave., Suite 1800 Seattle WA 98101	Ms. Heidi Blischke GSI Water Solutions, Inc. 55 SW Yamhill St., Suite 300 Portland, OR 97204	Ms. RueAnn Thomas Environmental Programs Director J.H. Baxter & Co. P.O. Box 10797 Eugene, OR 97440-2797
Edward C. Smith Senior Environmental Manager McFarland Cascade Holdings Inc. P.O. Box 1496 Tacoma, WA 98701-1496		Mr. Dean Yasuda Washington Department of Ecology 3190 160th Ave SE Bellevue, WA 98008-5452

**bcc(s)** (include name, title, organization, mailing address, and email if PDF is required—attach a list if necessary)

	<b>J. Palumbo (AWT-121)</b>	
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Mailing Deadline:	5/20/15	Certified Mail:	original only
FAX to:		FAX #:	

ADDITIONAL INFO/INSTRUCTIONS: Please send me PDF of letter and attachment when you mail out and I will email to the facility. Thanks.
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